

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ Delta, LLC,  
*Plaintiff,*

v.

CommScope Holding Company, Inc., *et al.*,  
*Defendants.*

Civil Action No.: 2:21-CV-00310-JRG  
(Lead Case)

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TQ Delta, LLC,  
*Plaintiff,*

v.

Nokia Corp., *et al.*,  
*Defendants.*

Civil Action No.: 2:21-CV-00309-JRG  
(Member Case)

**JOINT MOTION TO AMEND THIRD AMENDED DOCKET CONTROL ORDER**

Plaintiff TQ Delta, LLC and Defendants CommScope Holding Company, Inc., *et al.* (collectively “the Parties”) hereby file this Joint Motion to Amend the Third Amended Docket Control Order. Dkt. No. 299. A proposed Fourth Amended Docket Control Order is submitted with this Motion.

The current deadline to complete expert discovery is December 7, 2022. The Parties submit that good cause exists for the proposed two-day extension to allow additional time to complete expert discovery to take the deposition of TQ Delta’s expert Todor Cooklev, Ph.D. on December 8 and 9, 2022 and the deposition of CommScope’s expert Walter Overby on December 9, 2022. Due to scheduling conflicts, the depositions of Dr. Cooklev and Mr. Overby cannot be taken before the December 7 deadline. Therefore, the parties jointly and respectfully request that the Court

extend the deadline to complete expert discovery from December 7, 2022 to December 9, 2022  
and enter the attached proposed Fourth Amended Docket Control Order.

Dated: November 30, 2022

By: /s/ William E. Davis, III

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document and all attachments thereto are being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this November 30, 2022, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ William E. Davis, III  
William E. Davis, III

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the foregoing motion is joined in its entirety by Plaintiff TQ Delta, LLC and the CommScope Defendants.

/s/ William E. Davis, III  
William E. Davis, III